



# ARKANSAS DEPARTMENT OF EDUCATION

Dr. Tom W. Kimbrell  
Commissioner

June 26, 2014

Via ECFS

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Notice of Ex Parte Presentation*  
Modernizing the E-Rate Program for Schools and Libraries, WC Docket  
No. 13-184

Dear Ms. Dortch:

The Arkansas Department of Education wishes to reiterate its support for the use of consortia in the E-rate program and the need for expedited E-rate reform.

A study on digital learning in Arkansas, which was released in May 2014, echoes the widespread belief that the state's broadband capacity is inadequate to meet the needs of at least 80 percent of schools and called on state leaders to "establish and maintain a scalable, equitable, affordable, highspeed broadband infrastructure solution for all K-12 schools."<sup>1</sup>

As is clear from our report, the Arkansas Department of Education believes consortia can play an instrumental role in helping the state reach its goals. For example, consortia can help:

- Centralize management for statewide network support services such as billing, network recommendations, network implementation, and network monitoring, vendor management, and problem resolution;
- Aggregate statewide demand to achieve greater economies of scale, reduce costs, and improve access;
- Encourage public/private partnerships that leverage existing resources to lower costs and improve access; and
- Optimize the use of E-rate funds.

However, to date, efforts to build an effective statewide consortia have been deterred by the delay and uncertainty that accompany consortia applications within the E-rate program (in addition to the existence of competing state legislative priorities).

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<sup>1</sup> State of Arkansas, Arkansas Digital Learning Study (May 2014), [http://www.arkansased.org/public/userfiles/Legislative\\_Services/Quality%20Digital%20Learning%20Study/Facts/FOR\\_PUBLICATION\\_Arkansas\\_Digital\\_Learning\\_Study\\_050614.pdf](http://www.arkansased.org/public/userfiles/Legislative_Services/Quality%20Digital%20Learning%20Study/Facts/FOR_PUBLICATION_Arkansas_Digital_Learning_Study_050614.pdf).

We, therefore, call on the Commission to not only knock down these current barriers to consortia formation in Arkansas, but also create clear incentives for the formation of statewide consortia. More specifically, the Arkansas Department of Education endorses the definition of consortia proposed by the Education Coalition in its May 29 letter to the Commission as well as the proposal for awarding a five percent discount to large consortia – like the one we hope to create in Arkansas - that satisfy the definitional criteria laid out in the letter.<sup>2</sup> We believe that this modest discount adjustment would provide the incentives necessary for school districts, state legislators, and other state leaders to commit to build the statewide consortia that our Arkansas' students need.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically. Please contact the undersigned if you have any questions.

Sincerely,



Susan Bonesteel Harriman  
Director of Policy and Special Projects

cc: Lisa Hone, Chas Eberle, Johnathan Chambers, Nick Alexander, and Michael Steffan

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<sup>2</sup> Education Coalition Ex Parte (May 29, 2014), <http://appsfcc.gov/ecfs/document/view?id=7521153807>.